UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

RANGER OFFSHORE MEXICO, S. DE § R.L. DE C.V., Plaintiff, VS. GRUPO TRADECO, S.A. DE C.V., TRADECO INFRAESTRUCTURA, S.A. DE C.V. Defendants, Case No. 4:15-cv-00635 VS. Admiralty TRADECO INFRAESTRUCTURA, S.A. DE C.V., TRADECO INFRASTRUCTURE, INC., TRADECO INGENIERIA, S.A. DE C.V., INNOVACIONES TÉCHNICAS EN CIMENTACIÓN, S.A. DE C.V., TCO CONCRETE, INC., TEXAS § DEPARTMENT OF TRANSPORTATION §

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PLAINTIFF RANGER OFFSHORE MEXICO, S. DE R.L. DE C.V.'S UNOPPOSED MOTION TO EXTEND THE SUBMISSION DATE FOR DEFENDANT TRADECO INFRAESTRUCTURA, S.A. DE C.V.'S MOTION TO COMPEL ARBITRATION AND FOR STAY OR DISMISSAL OF LITIGATION

Plaintiff Ranger Offshore Mexico, S. de R.L. de C.V. ("Ranger") files this Unopposed Motion to Extend the Submission Date for Defendant Tradeco Infraestructura, S.A. de C.V.'s ("Tradeco") Motion to Compel Arbitration and for Stay or Dismissal of Litigation (the "Motion") [Doc. 13].

1. Tradeco filed the Motion on Wednesday, April 8, 2015. [Doc. 13].

- 2. The Motion is set on the Court's submission docket for Wednesday, April 29, 2015 (the "Submission Date"). See Local Rule 7.3.
- 3. After receiving the Motion, Ranger requested that Tradeco agree to an extension of the Submission Date for two (2) weeks.
 - 4. Tradeco is unopposed to Ranger's requested extension.
- 5. Accordingly, Ranger respectfully requests an extension of the Submission Date to Wednesday, May 13, 2015.
- 6. This unopposed motion is not brought for purposes of delay, but so that justice may be done. Ranger's requested extension will not alter any current deadlines in this case and is made in good faith.

For the foregoing reasons, Ranger respectfully requests that the Court grant this unopposed motion and extend the Submission Date for Defendant's Motion to Wednesday, May 13, 2015.

Respectfully submitted, Dated: April 21, 2015

/s/ Brett J. Young

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ATTORNEYS FOR PLAINTIFF RANGER OFFSHORE MEXICO, S. DE R.L. DE C.V.

CERTIFICATE OF CONFERENCE

On April 17, 2015, I conferred with counsel for Defendant Tradeco Infraestructura, S.A. de C.V. regarding Plaintiff Ranger Offshore Mexico, S. de R.L. de C.V.'s request for an extension of the Submission Date for Defendant's Motion to Compel Arbitration and for Stay or Dismissal of Litigation to Wednesday, May 13, 2015. Counsel for Tradeco indicated that Tradeco is unopposed to Ranger's requested extension mentioned above.

/s/ Brett J. Young
Brett J. Young

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on the following counsel of record on this 21st day of April 2015 pursuant to Federal Rule of Civil Procedure 5 and Local Rule 5, as follows:

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